



California State Fire Marshal **CODE INTERPRETATION**

Date Issued	03-11-03	Interpretation #	03-009 REVISED
Topic	High Rise Access		
Code Section(s)	Section 403.11.1 California Building Code (1998 ed)		
Requested by	Thomas E. Harvey San Francisco Fire Department 698 Second Street San Francisco, CA 94107-2015		

SCENARIO: Section 403.11.1 of the California Building Code (1998 ed) provides that an existing high-rise building is one with the highest floor used for human occupancy located more than 75 feet above the lowest floor having “building access”. Please assume for my question that (1) the enforcing agency has determined the “building access” (using reasonable judgment as provided in the “Note” in Section 403.11.1), and (2) the “building access” is located more than two feet above the adjacent ground level.

- 1. Must the highest measurements be taken from the floor surface of the level immediately below the “building access”?***

Yes. Measurement shall be taken from the floor surface of the story or basement immediately below.

- 2. Does Section 403.11.1 allow the enforcing agency discretion to measure from the ground level adjacent to the “building access” if there is access to the building from level or levels below the “building access”?**

No. Building access is defined as an exterior door opening suitable and available for fire department use. It is at that point from which the measurement should be taken.

- 3. Does Section 403.11.1 provide the enforcing agency with the ability to use “reasonable judgment” to use a measuring point other than the floor surface of the level immediately below the “building access” if the building access is just inches more than two feet above the adjacent grade?**

No. Section 403.11.1 is exclusive to existing high-rise buildings. Therefore, under this section “building access” means an exterior door opening located not more than 2 feet above the adjacent ground level.

- 4. Section 13210 of the California Health and Safety Code also defines high-rise buildings. Its language is similar to that of the CBC in that the Health and Safety Code defines a high-rise building as one with the highest floor for human occupancy located more than 75 feet above “building access”. The Health and Safety Code, however, does not contain a definition for the term “building access”. This raises the following questions:**

- (a) Is Section 403.11.1 consistent with Section 13210 of the Health and Safety Code?**
- (b) If they are inconsistent, which Code takes precedence in determining whether or not an existing structure is a high-rise building?**

The Statute and the regulation are consistent. In this case, the regulation compliments the law by adding the definition of “building access”